

EXHIBIT 2

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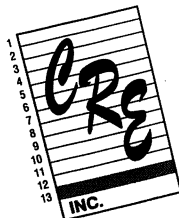
1 EQUAL EMPLOYMENT * IN THE
2 OPPORTUNITY COMMISSION, * UNITED STATES
3 Plaintiff, * DISTRICT COURT
4 vs. * FOR THE
5 WARFIELD-ROHR CASKET * DISTRICT OF MARYLAND
6 COMPANY, INC., * CIVIL ACTION NUMBER:
7 Defendant. * WMN-01-2872

8 * * * * *

9 DEPOSITION OF:

10 WILLIAM HOWARD AYRES,
11 was taken on Thursday, March 21, 2002, commencing
12 at 9:19 a.m., at the Equal Employment Opportunity
13 Commission, 10 South Howard Street, Third Floor,
14 Baltimore, Maryland, before Carla J. Briggs, CSR,
15 RMR, CRR, Notary Public.

16 * * * * *



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AFTERNOON SESSION

(1:35 p.m.)

BY MS. ANDREW:

Q. Okay. I'm going to ask you about Exhibit Number 10 and I'm going to hand that to you and have you look at it for a few minutes, and make sure I have a copy for Mr. Hirsch somewhere in here.

A. Is it only seven on here? Oh, I see it. There's another page. Yeah. Okay.

Q. Okay. Can you identify for the record, Mr. Ayres, what Exhibit 10 is?

A. It's the -- a copy of the original paper that I did -- let Mr. Kuehnl go with. Terminated Mr. Kuehnl with.

Q. Okay. So it's a copy of the original notes that you took when you let Mr. Kuehnl go; is that correct?

A. It's a copy of the notes I prepared prior to meeting with Mr. Kuehnl and I used in presentation when I terminated him.

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1 Q. It was a termination. Did you prepare
2 notes to --

3 A. Probably.

4 Q. Okay. What was that person's name?

5 A. Chip Graumlich.

6 Q. Graumlich?

7 A. G-R-A-U-M-L-I-C-H, I believe.

8 Q. Now, when I asked you if you prepared
9 notes to terminate Mr. Graumlich -- is that how
10 you say it?

11 A. I think it was Graumlich.

12 Q. Graumlich. -- did you put those notes
13 in his personnel file or -- because you said you
14 probably did it. I'm just trying --

15 A. I don't know. I'd have to look.

16 Q. Okay. Was it your practice then to
17 keep notes of what you were going to say to a
18 person before you terminated them?

19 A. It was my practice to keep notes on
20 any time I was going to do a presentation to
21 anybody.

1 (Ayres Deposition Exhibit Number 12
2 was marked for identification.)

3 MS. ANDREW: I need to make another
4 copy of that. I'm sorry.

5 Mark that.

6 (Ayres Deposition Exhibit Number 13
7 was marked for identification.)

8 BY MS. ANDREW:

9 Q. Looking at the exhibit that I put in
10 front of you that's Exhibit 12, can you tell me
11 what that is, please?

12 A. It's a letter that was sent to all
13 employees one November 26th, 1999 telling them
14 that vacations could not be carried over anymore,
15 that they had to take the vacation the calendar
16 year from May the 1st to September 30th.

17 Q. Okay. Did you issue that memorandum?

18 A. Yes. This is from me.

19 Q. Was that a change in policy from the
20 way things were done before?

21 A. Yeah. Things had gotten pretty loose.